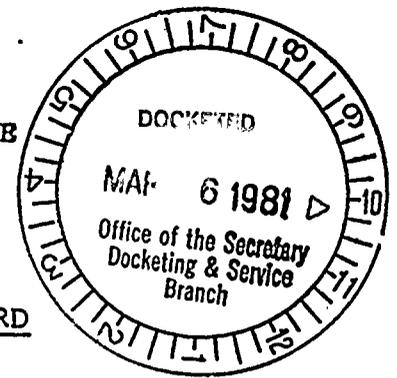


RELATED CORRESPONDENCE

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD



In the Matter of )  
 )  
PACIFIC GAS AND ELECTRIC COMPANY )  
 )  
(Diablo Canyon Nuclear Power )  
Plant, Units No. 1 and 2) )

Docket Nos. 50-275  
50-323

(Low-Power License)

2/27/81



APPLICANT PACIFIC GAS AND ELECTRIC COMPANY'S  
FIRST SET OF INTERROGATORIES AND REQUESTS  
FOR PRODUCTION OF DOCUMENTS  
TO JOINT INTERVENORS

Pursuant to 10 C.F.R. §§ 2.740-2.741, Applicant PACIFIC GAS AND ELECTRIC COMPANY ("Applicant") hereby propounds the following Interrogatories and Requests for Production of Documents to the SAN LUIS OBISPO MOTHERS FOR PEACE, SCENIC SHORELINE PRESERVATION CONFERENCE, INC., ECOLOGY ACTION CLUB, SANDRA SILVER, GORDON SILVER, ELIZABETH APFELBERG and JOHN J. FORSTER ("Joint Intervenors").

I

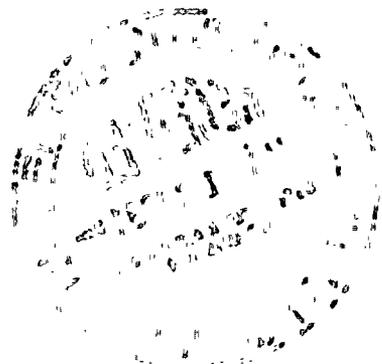
INSTRUCTIONS

1. All information is to be divulged which is in the possession of the individual or corporate party, their attorneys, investigators, agents, employees or other representatives of the named party and their attorneys.
2. Where an individual Interrogatory calls for an answer which involves more than one part, each part of the answer should be clearly set out so that it is understandable.
3. In the event the space provided is not sufficient for your answer to any of the questions, please attach a separate sheet of paper with the additional information.
4. These Interrogatories are intended as continuing Interrogatories, requiring you to answer by supplemental answer, setting forth any information within the scope of the Interrogatories as may be acquired by you, your agents, attorneys or representatives following your original answers.

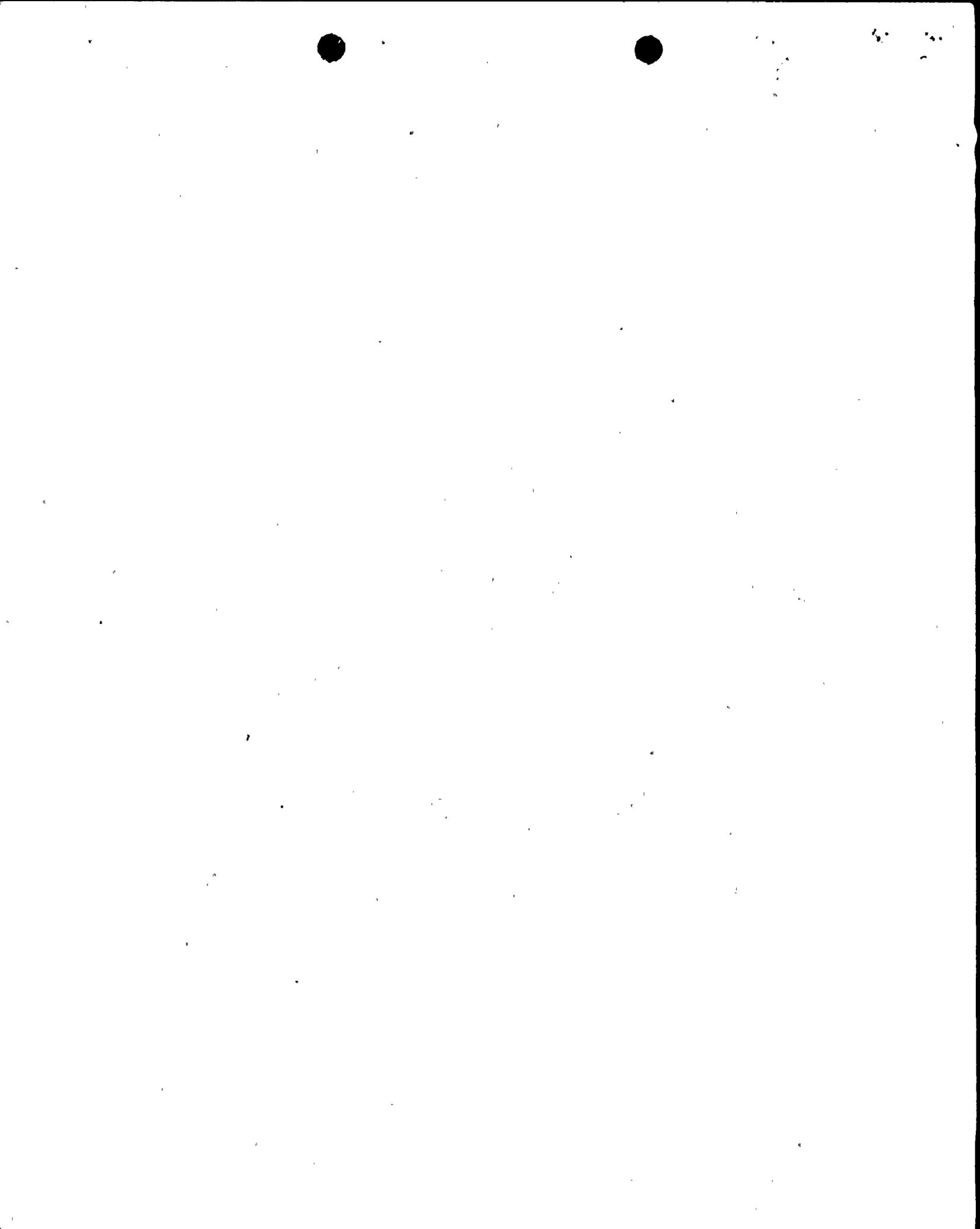
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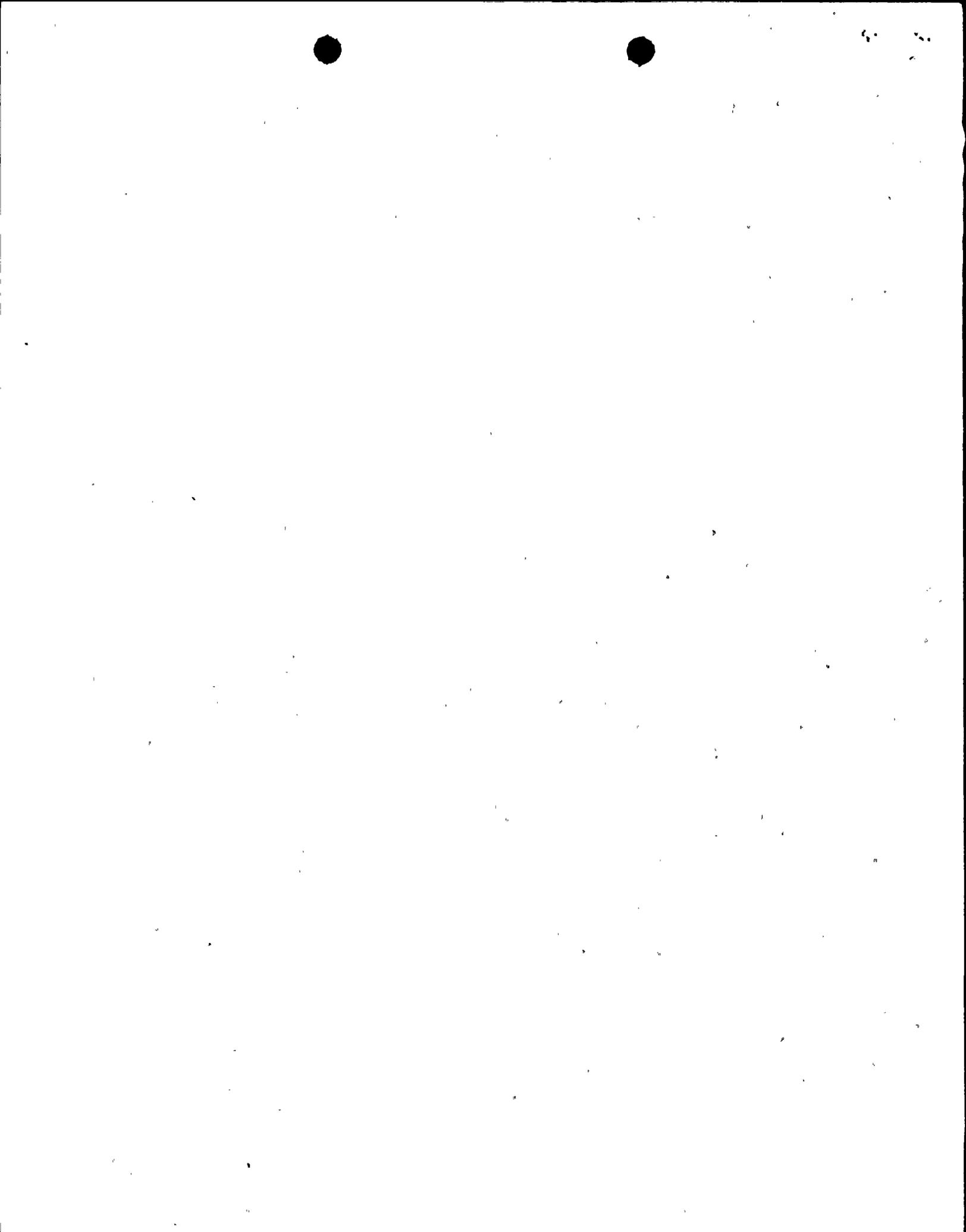




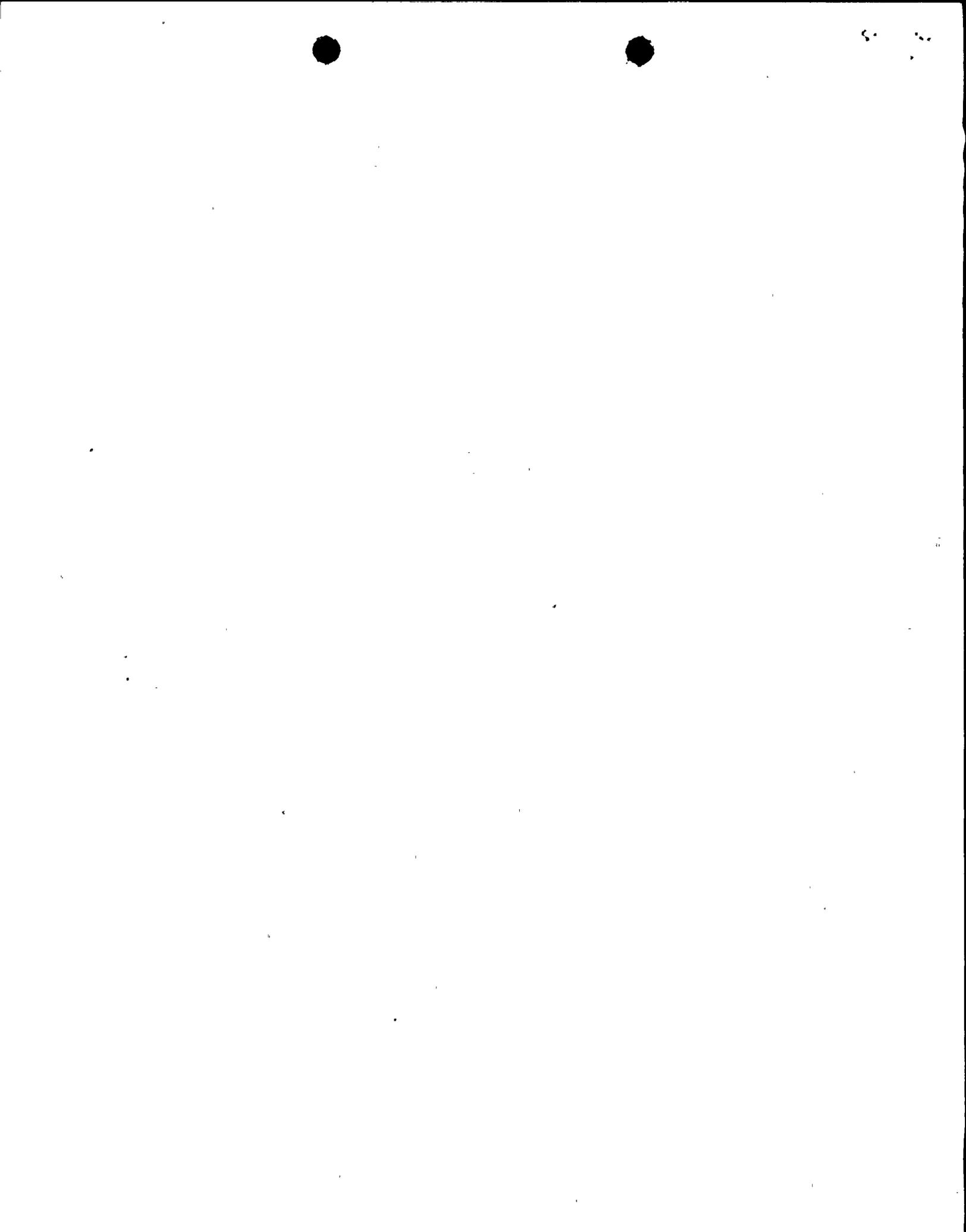
4. If the answer to Interrogatory 3 is yes, specify in detail each and every deficiency in the Applicant, State and local emergency response plans. Identify each and every fact and document relied upon in responding to this Interrogatory.
  
5. For each deficiency specified in the answer to Interrogatory 4, specify whether the deficiency is significant for Diablo Canyon, for purposes of fuel-loading and low-power testing, and for each such deficiency specified as significant, explain in detail the basis for such conclusion. Identify each and every fact and document relied upon in responding to this Interrogatory.
  
6. For each deficiency specified as significant in the answer to Interrogatory 5, specify in detail what measures should be taken by Applicant to compensate for such deficiency.

CONTENTION 5

7. Is it your position that the combined Applicant, State and local emergency response plans fail to comply with the requirements of Sections III.A.1.1 and III.A.1.2 of NUREG-0694?



8. If the answer to Interrogatory 7 is yes, specify in detail each and every deficiency in the combined Applicant, State and local emergency response plans relative to compliance with the requirements of Sections III.A.1.1 and III.A.1.2 of NUREG-0694. Identify each and every fact and document relied upon in responding to this Interrogatory.
  
9. For each deficiency specified in the answer to Interrogatory 8, specify in detail what actions should be taken by Applicant to comply with the requirements of Sections III.A.1.1 and III.A.1.2 of NUREG-0694.
  
10. Is it your position that the implementation schedule for meeting the requirements of Sections III.A.1.1 and III.A.1.2 of NUREG-0694 were unchanged by NUREG-0737?
  
11. If the answer to Interrogatory 10 is no, specify in detail what changes to the implementation schedule were made by NUREG-0737.



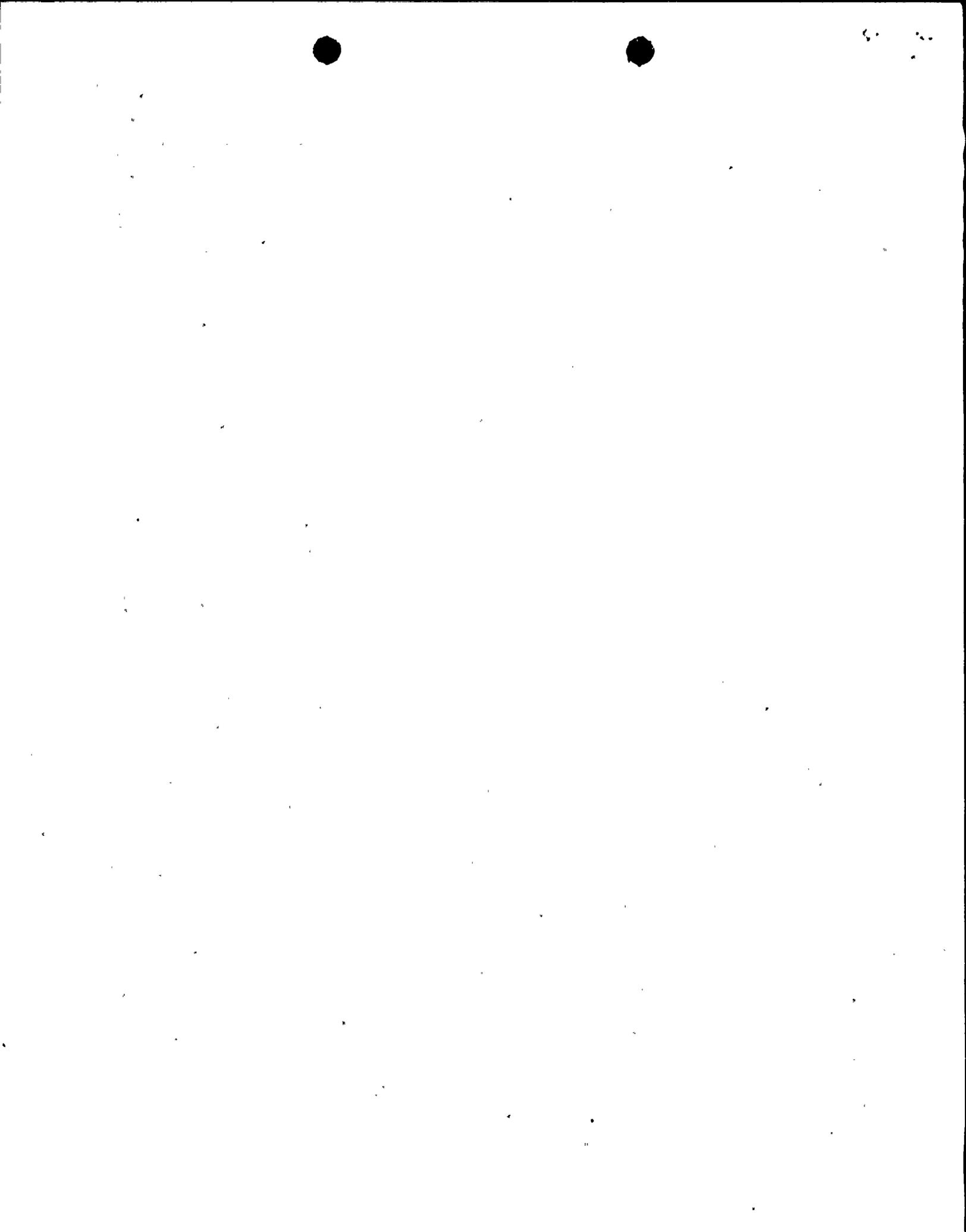
12. Is it your position that the combined Applicant, State and local emergency response plans must fully comply with the requirements of Section III.A.1.2 of NUREG-0694 before fuel-loading and low-power testing?

13. If the answer to Interrogatory 12 is yes, please specify in detail each and every fact supporting that answer. Identify each and every document relied upon in responding to this Interrogatory.

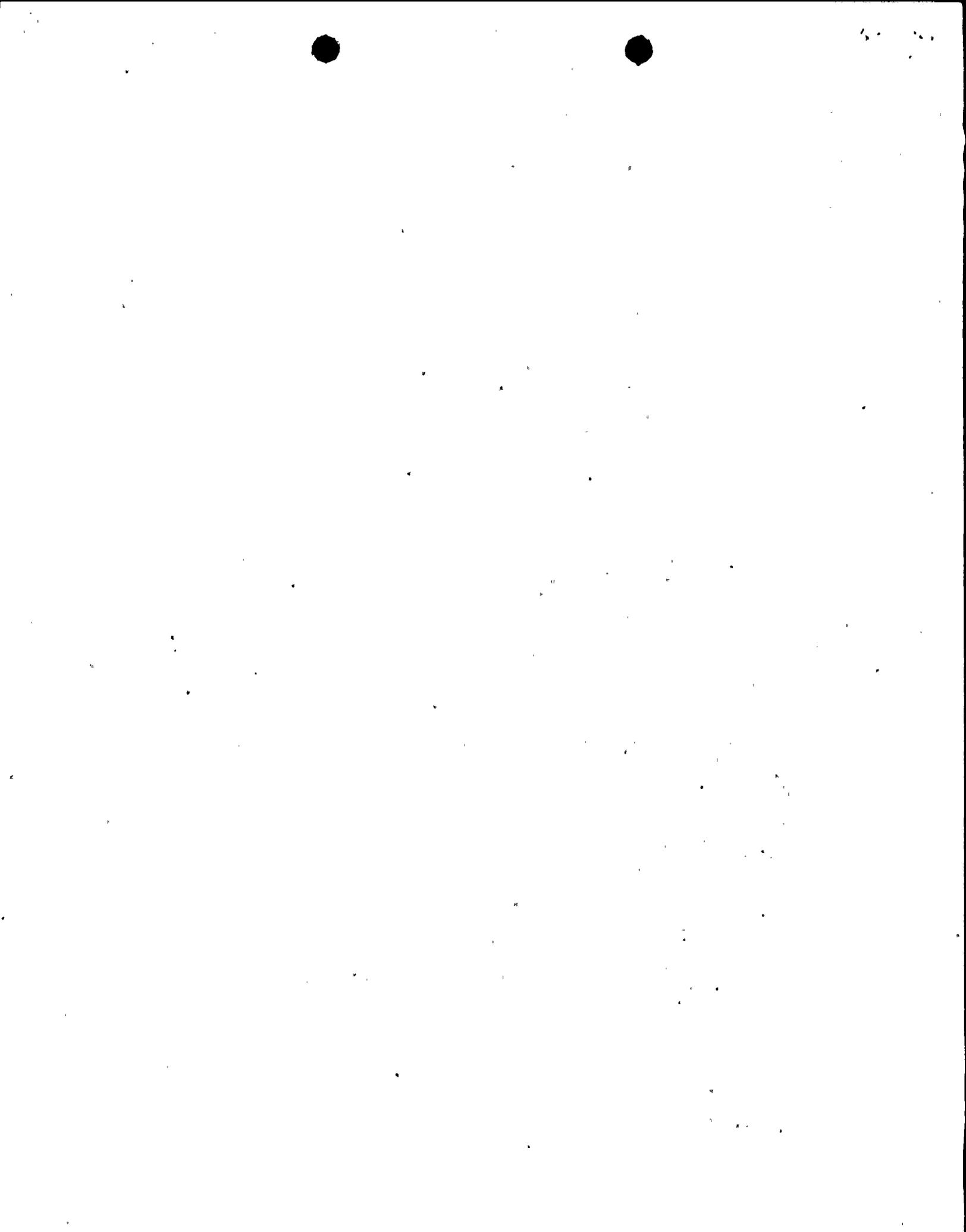
CONTENTION 11

14. Describe in detail your understanding of the power supply for the pressurizer heaters for Diablo Canyon when off-site power is available. Identify each and every fact and document relied upon in responding to this Interrogatory.

15. Describe in detail your understanding of the power supply for the pressurizer heaters when off-site power is not available. Identify each and every fact and document relied upon in responding to this Interrogatory.



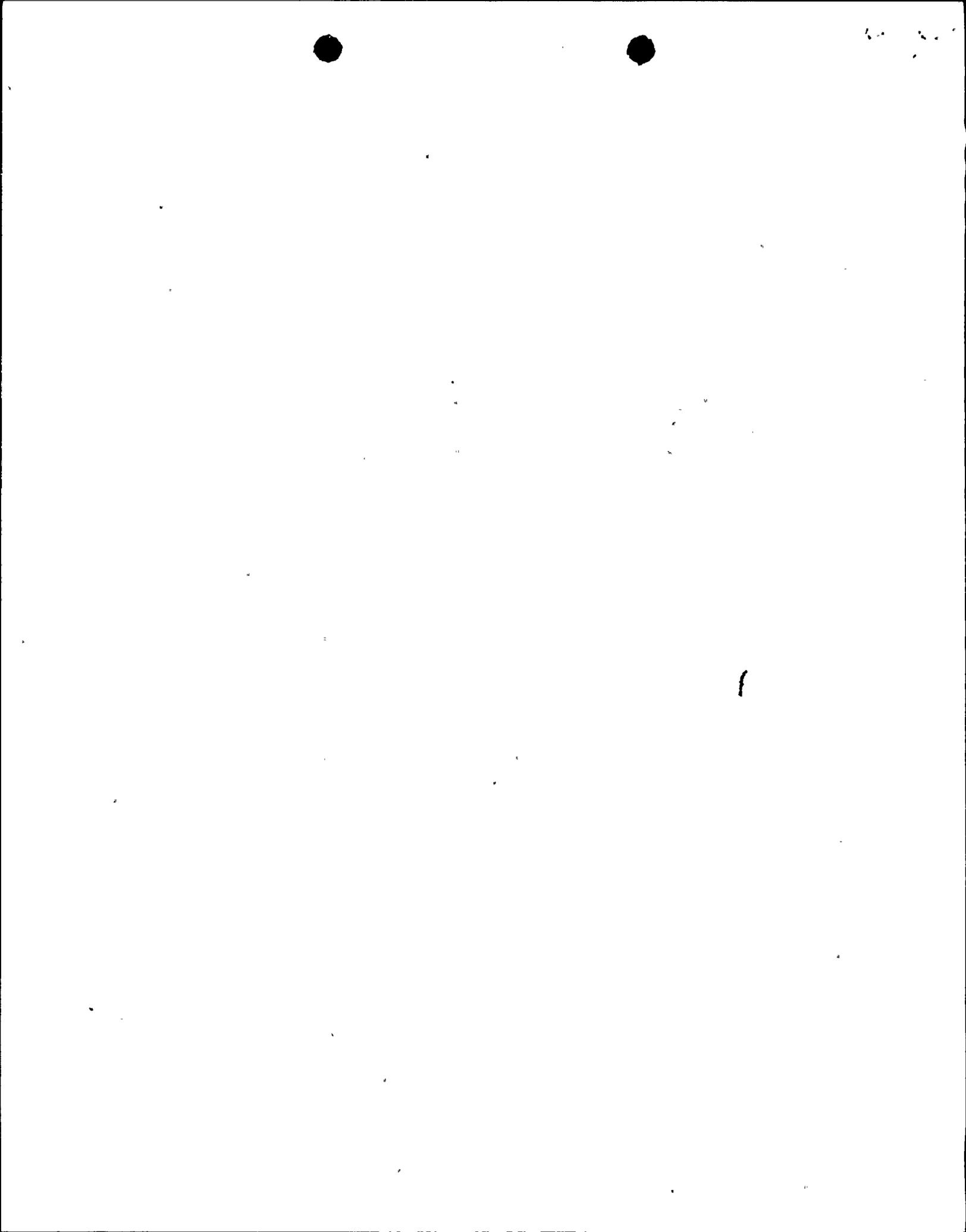
16. Is it your understanding that the pressurizer heaters will be added to the on-site emergency power system only if off-site power is not available?
17. If the answer to Interrogatory 16 is no, explain under what other situations the pressurizer heaters will be added to the on-site emergency power system. Identify each and every fact and document relied upon in responding to this Interrogatory.
18. Is it your position that connecting the pressurizer heaters to the on-site emergency power system, or supplying power to the pressurizer heaters from the on-site emergency power system, will degrade the capacity, capability and reliability of the on-site emergency power system such that the emergency power system will no longer be in compliance with General Design Criterion 17?
19. If the answer to Interrogatory 18 is yes, explain in detail how the on-site emergency power system will no longer be in compliance with General Design Criterion 17. Identify each and every fact and document relied upon in responding to this Interrogatory.



20. Identify each and every requirement of the "Position" and "Clarification" set forth at pages 3-85 and 3-86 of NUREG-0737 which you contend is not met at Diablo Canyon.
  
21. For each requirement identified in the answer to Interrogatory 20, explain in detail how Diablo Canyon fails to meet such requirement. Identify each and every fact and document relied upon in responding to this Interrogatory.
  
22. For each requirement identified in the answer to Interrogatory 20, explain in detail what Applicant should do in order to comply with such requirement for Diablo Canyon.

CONTENTION 13

23. Identify each requirement for fuel-loading of Item 11.F.2 of NUREG-0737 which is not met for Diablo Canyon. Identify each and every fact and document relied upon in responding to this Interrogatory.

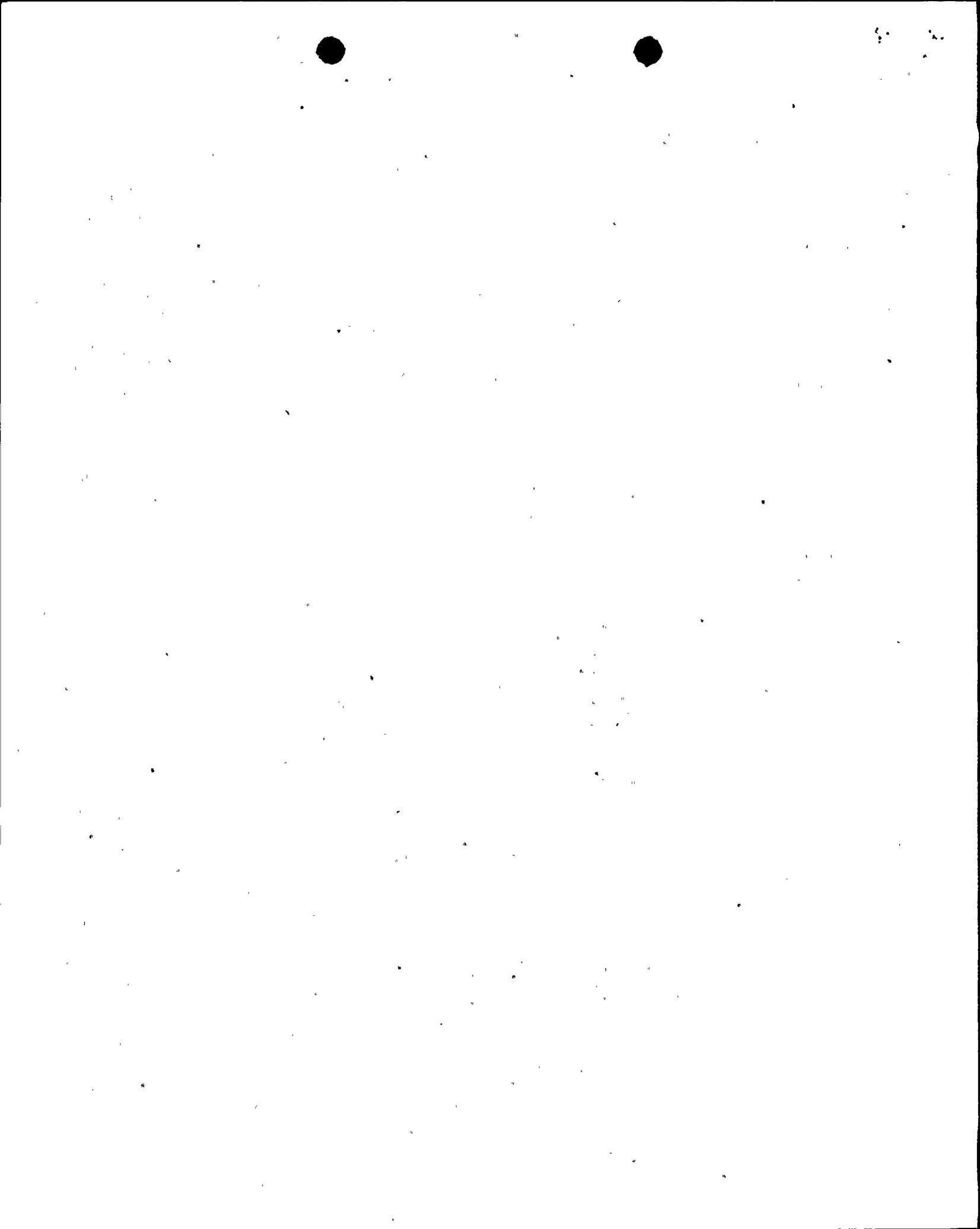


24. Is it your position that the additional instrumentation referenced in Item II.F.2 of NUREG-0737 is required prior to fuel-loading?

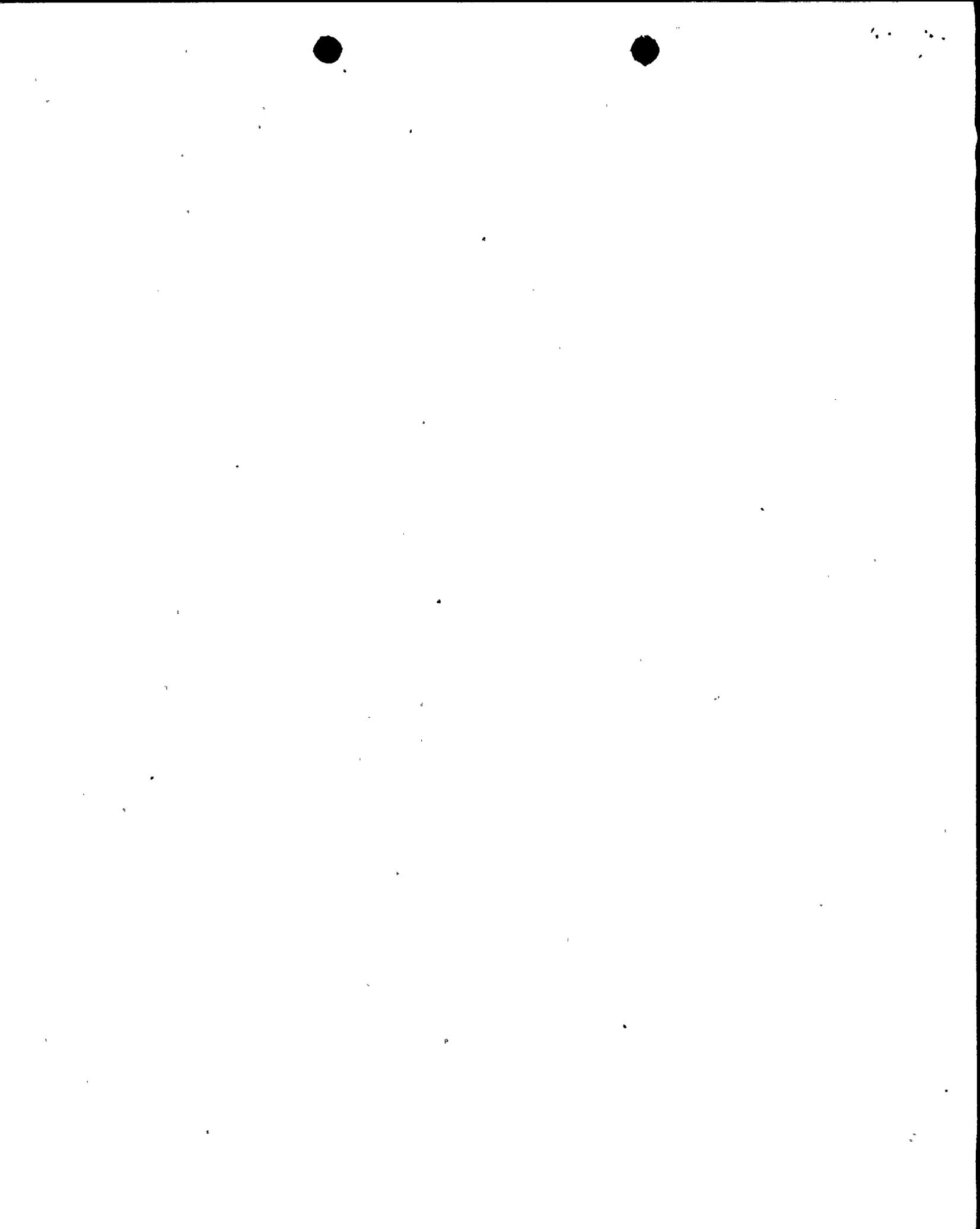
25. If the answer to Interrogatory 24 is yes, explain in detail the basis for, and identify each and every fact and document in support of, your answer.

26. Is it your position that the additional instrumentation referenced in Item II.F.2 of NUREG-0737 must include instrumentation which measures reactor coolant level directly?

27. If the answer to Interrogatory 26 is yes, explain in detail the basis for, and identify each and every fact and document in support of, your answer.



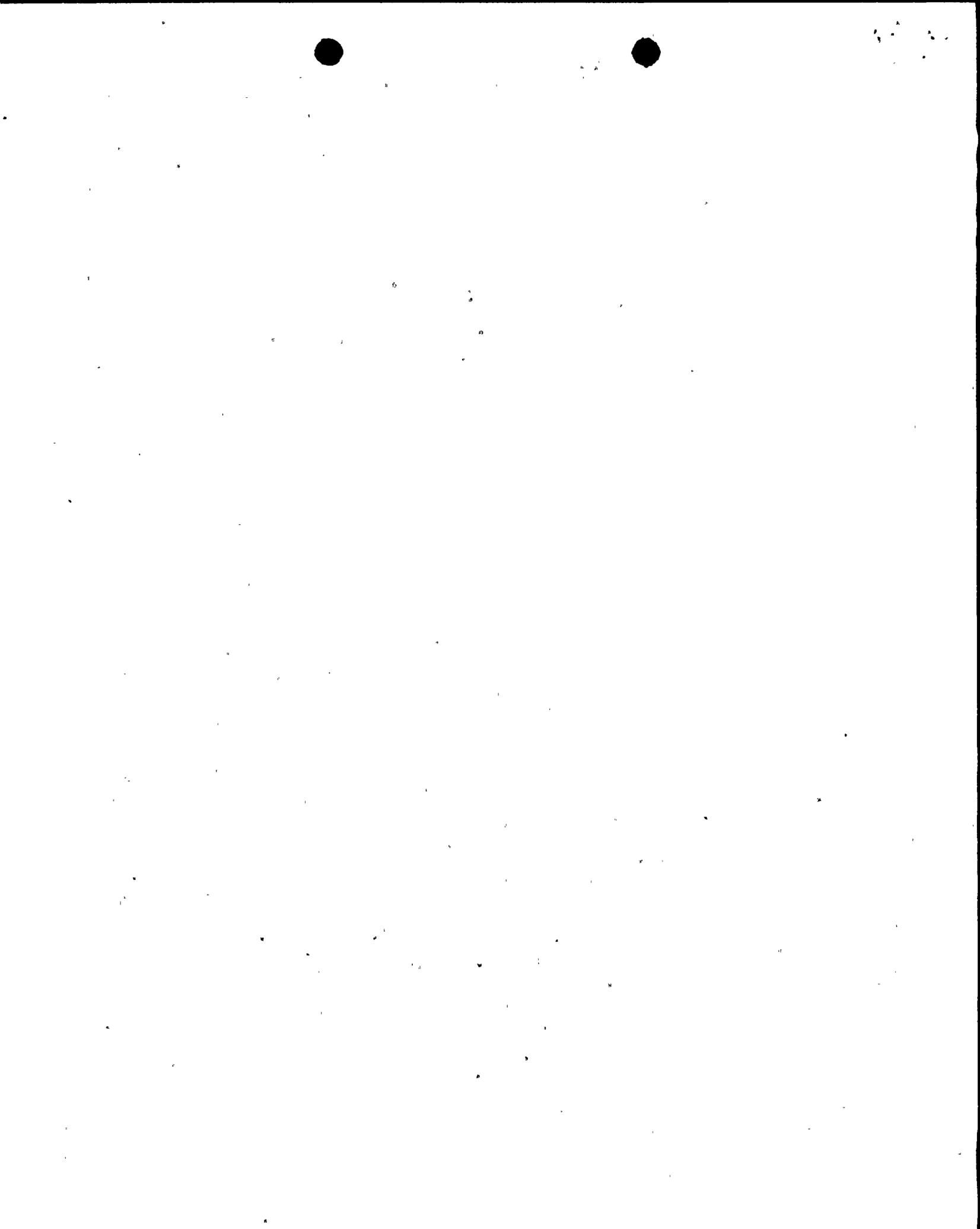
28. Is it your position that the instrumentation for detection of inadequate core cooling described in Applicant's response to Item II.F.2 of NUREG-0737 (submitted February 6, 1981) does not provide a direct measurement of the water level in the reactor vessel?
29. If the answer to Interrogatory 28 is yes, explain in detail the basis for, and identify each and every fact and document in support of, your answer.
30. Is it your position that the instrumentation for detection of inadequate core cooling described in Applicant's response to Item II.F. 2 of NUREG-0737 (submitted February 6, 1981) does not satisfy the requirement for additional instrumentation referenced in Item II.F.2 of NUREG-0737?
31. If the answer to Interrogatory 30 is yes, explain in detail the basis for, and identify each and every fact and document in support of, your answer.



32. If the answer to Interrogatory 30 is yes, specify in detail what additional instrumentation should be provided in order to meet the requirements of Item II.F.2 of NUREG-0737.

CONTENTION 24

33. Identify each and every requirement for fuel-loading set forth in Item II.D.1 of NUREG-0737 which you are contending is not met for Diablo Canyon. Explain the basis for, and identify each and every fact and document in support of, your answer.
34. For each requirement identified in the answer to Interrogatory 33, specify in detail what should be done by Applicant in order to comply with such requirement.
35. Is it your contention that the block valve tests referenced in Item II.D.1 of NUREG-0737 must be completed prior to fuel-loading?

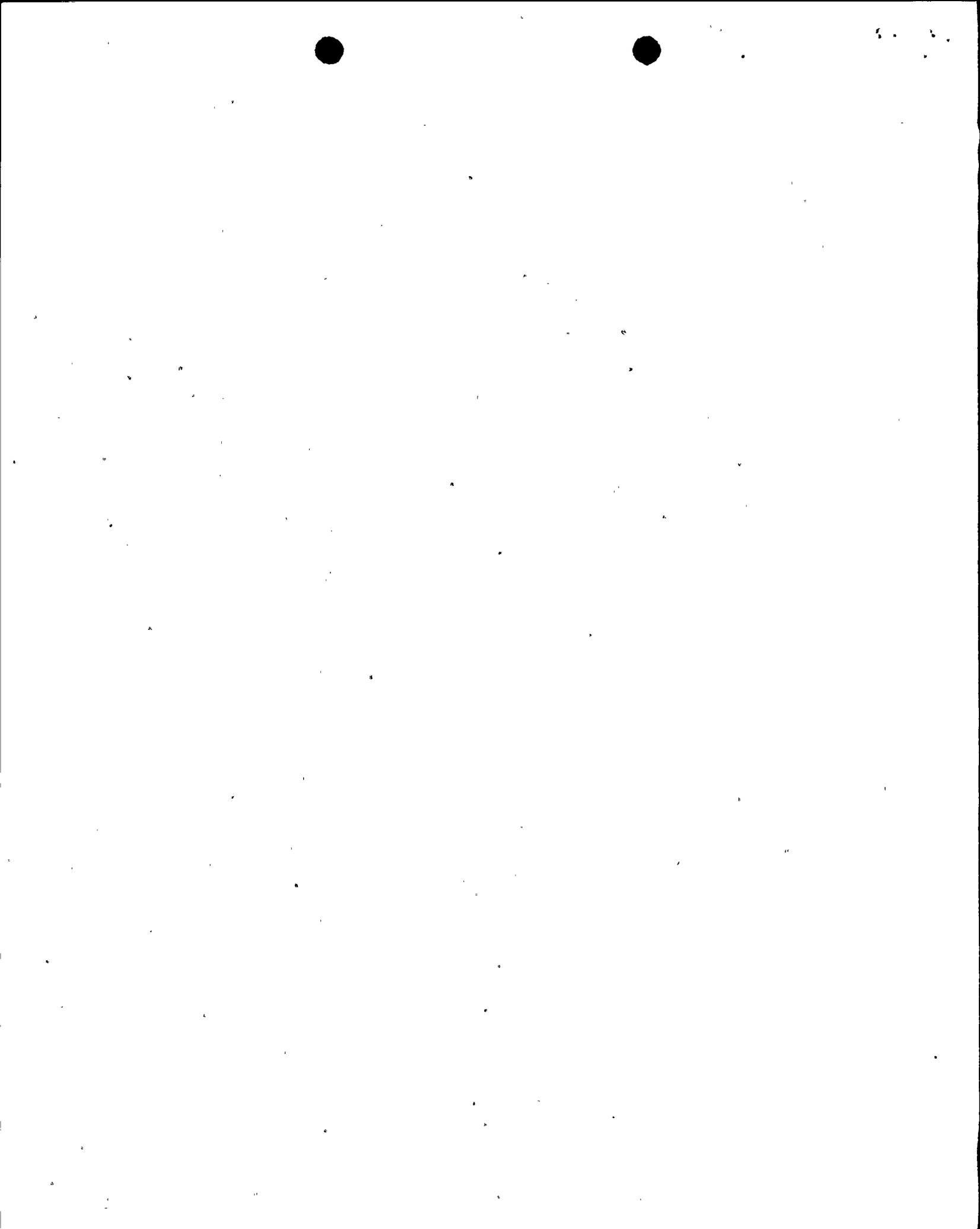


36. If the answer to Interrogatory 35 is yes, explain fully the basis for, and identify each and every fact and document in support of, your answer.
37. Contention 24 states that appropriate qualification testing has not been done to verify the capabilities of the reactor coolant system relief and safety valves to function during normal, transient and accident conditions. Explain fully and in detail what qualification testing of the reactor coolant system relief and safety valves has not been done which you believe should be done for Diablo Canyon prior to fuel-loading. Identify each and every fact and document relied upon in responding to this Interrogatory.

WITNESSES

38. As respects your answer to Interrogatories 1 through 37, please state:

(a) The name, occupation, address, and telephone number of each person who will be called as a witness to testify as to the facts set forth in those answers, identifying which facts each person will be testifying to.



(b) The field or science in which each such person is sufficiently schooled to enable them to express opinion evidence in this matter, if any.

(c) Whether such witness will base his opinion:

(i) in whole or in part upon facts acquired personally by that person in the course of an investigation or examination as to the facts; or

(ii) solely upon information provided that person by others.

(d) The qualifications of each such person that would render that person, if possible, as an expert witness.

(e) If any such witness has made a personal investigation or examination relating to any of the facts or bases set forth in the answers to Interrogatories 1 through 37, state the date(s) and nature of each such investigation or examination.



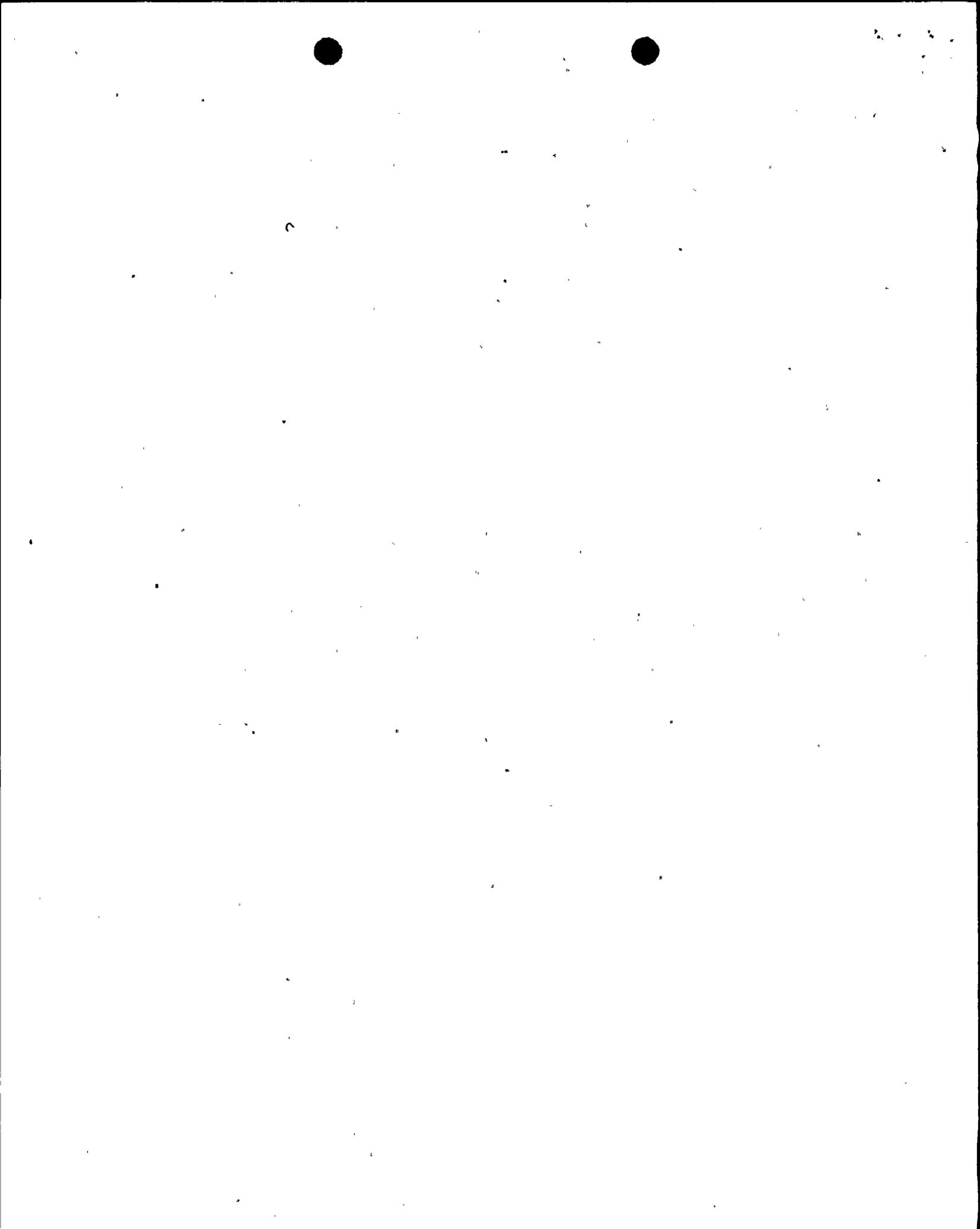
(f) Each and every fact, and each and every document, photograph, report, item, or other tangible object supplied or made available to each such person.

(g) Whether each such person has rendered written reports, regarding facts, bases, or opinions as respects your contentions referred to in Interrogatories 1 through 37. If so, state:

(i) the date(s) of each such report;

(ii) the name and address of the custodian of each such report.

39. List each expert witness you will call to testify in this matter.



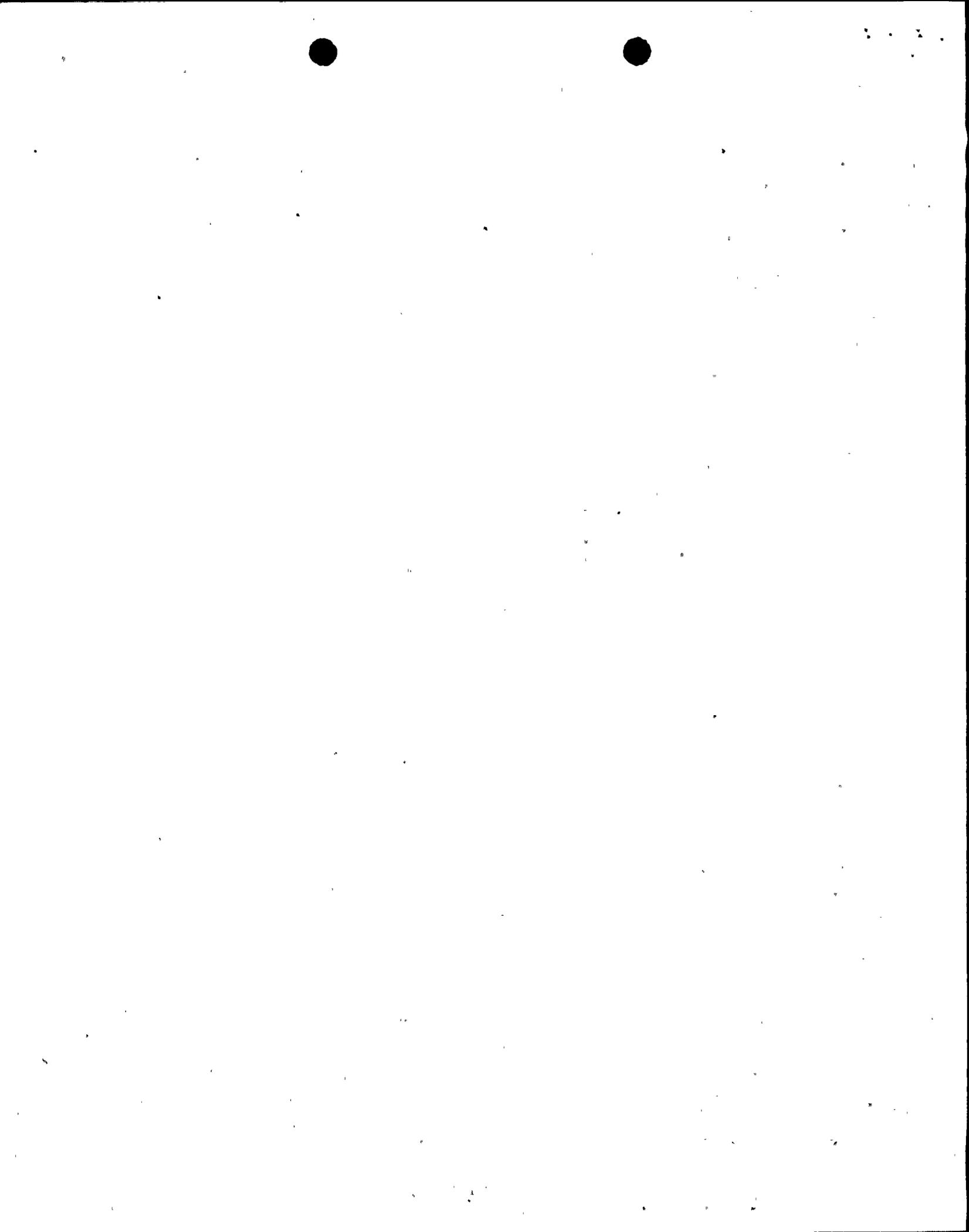
(a) If not previously given in answers to these Interrogatories, give the occupation, address, telephone number, educational background and experience (as it may relate to each such person's field of expertise, if any) of each expert witness.

(b) State the subject matter on which each such expert is expected to testify.

(c) State the facts to which each such expert is expected to testify.

(d) State each opinion, if any, which each such expert is expected to express in testimony.

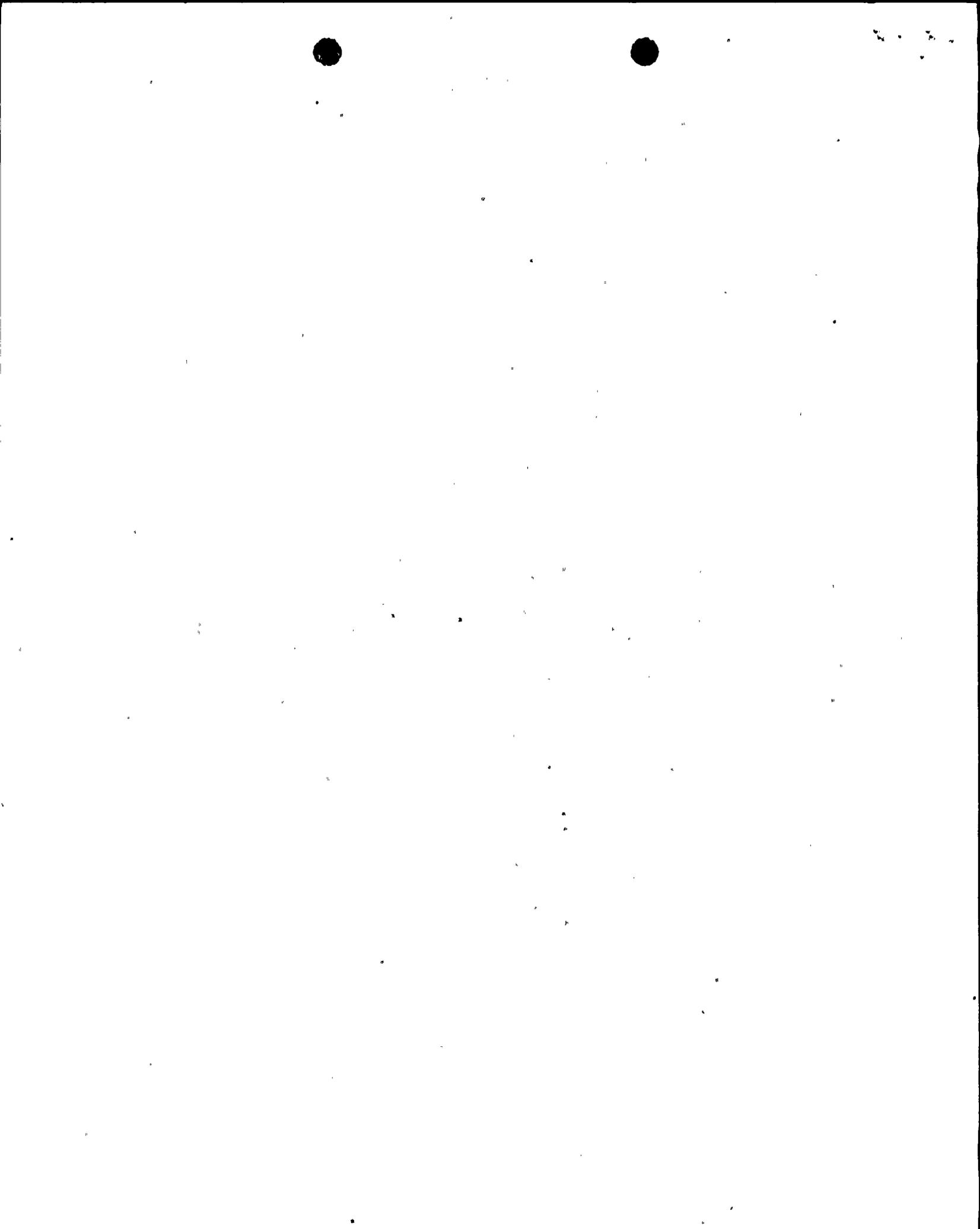
(e) Give a detailed summary of the grounds for each opinion expressed by each such expert.



EXHIBITS

40. Identify, with specificity, each and every exhibit you intend to use in this matter. As to each such exhibit, state which facts, opinions or contentions the exhibit supports, if any.

41. With reference to the exhibits listed in the preceding Interrogatory, state the source and nature of the exhibit, i.e., whether said exhibit is documentary, a picture, or whatever; who prepared each exhibit; its date of preparation; and, who has custody of each exhibit.



III

REQUESTS FOR PRODUCTION OF DOCUMENTS

1. Produce all documents identified in response to Interrogatories 1-39, above.
2. Produce all exhibits identified in response to Interrogatories 40-41, above.
3. Produce all reference materials (primary and secondary), publications and all other written materials upon which your expert witnesses will rely in formulating opinion testimony.

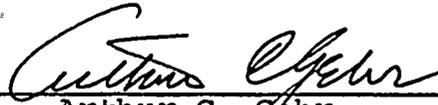
Respectfully submitted,

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Pacific Gas and Electric Company  
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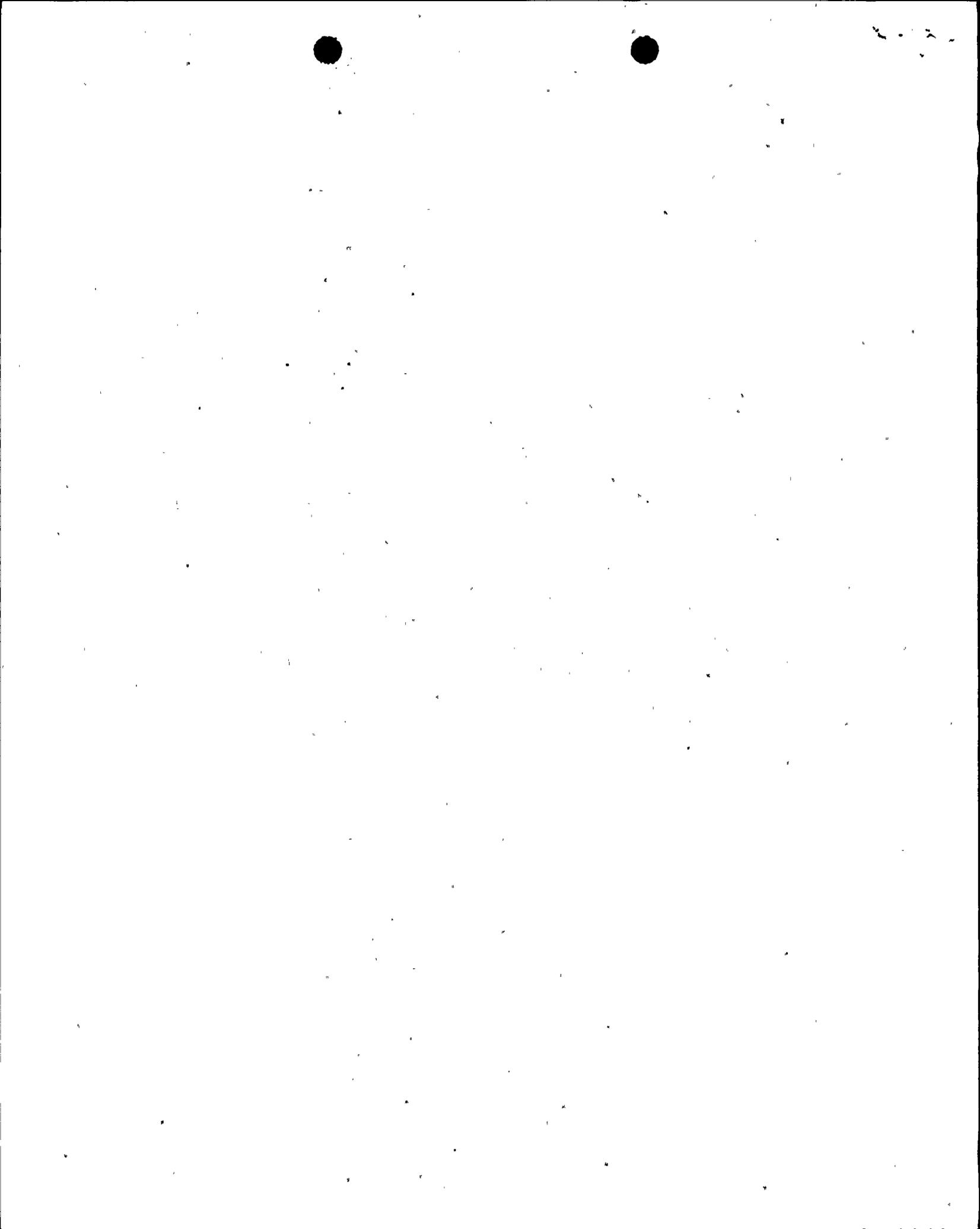
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By:   
Arthur C. Gehr

Dated: February 27, 1981.



UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of	)	
	)	Docket Nos. 50-275
PACIFIC GAS AND ELECTRIC COMPANY	)	50-323
	)	
(Diablo Canyon Nuclear Power	)	(Low-Power License)
Plant, Units No. 1 and 2)	)	
	)	

CERTIFICATE OF SERVICE

I hereby certify that copies of "APPLICANT PACIFIC GAS AND ELECTRIC COMPANY'S FIRST SET OF INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS TO JOINT INTERVENORS", dated February 27, 1981, have been served on the following by depositing in the United States mail this 28<sup>th</sup> day of February, 1981:

The Hon. Elizabeth S. Bowers  
Atomic Safety and Licensing Board  
Mail Drop East West 450  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

The Hon. Glenn O. Bright  
Atomic Safety and Licensing Board  
Mail Drop East West 450  
U.S. Nuclear Regulatory Commission  
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The Hon. Jerry R. Kline  
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Washington, D.C. 20555



Atomic Safety and Licensing  
Board Panel  
U. S. Nuclear Regulatory Commission  
Washington, D.C. 20555

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